

**GERRARD, COX & LARSEN**  
2450 St. Rose Parkway, Suite 200  
Henderson, NV 89074  
O: (702) 796-4000 F: (702) 796-47848

Douglas D. Gerrard, Esq.  
Nevada Bar No. 4613  
[dgerrard@gerrard-cox.com](mailto:dgerrard@gerrard-cox.com)  
Fredrick J. Biedermann, Esq.  
Nevada Bar No. 11918  
[fbiedermann@gerrard-cox.com](mailto:fbiedermann@gerrard-cox.com)  
**GERRARD COX LARSEN**  
2450 St. Rose Parkway, Suite 200  
Henderson, NV 89074  
Tel: (702) 796-4000  
Fax: (702) 796-4848

Natalie L. Winslow, Esq.  
Nevada Bar No. 12125  
Rex D. Garner, Esq.  
Nevada Bar No. 9401  
**AKERMAN, LLP**  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
Tel: (702) 634-5000  
Fax: (702) 380-8572  
[natalie.winslow@akerman.com](mailto:natalie.winslow@akerman.com)  
[rex.garner@akerman.com](mailto:rex.garner@akerman.com)

*Attorneys for Defendant Bank of America, N.A.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SFR INVESTMENTS POOL 1, LLC,

Plaintiff,

vs.

BANK OF AMERICA, NA, SUCCESSOR BY  
MERGER TO BAC HOME LOANS  
SERVICING, LP FKA COUNTRYWIDE HOME  
LOANS SERVICING, LP,

Defendants.

Case No. 2:19-cv-01534-JCM-DJA

**STIPULATION AND ORDER TO  
CONTINUE RESPONSE DEADLINE TO  
SFR'S MOTION FOR  
RECONSIDERATION FOR ORDER**

**(FIRST REQUEST)**

Defendant, BANK OF AMERICA, N.A., Successor by Merger To BAC Home Loan  
Servicing, LP, f/k/a Countrywide Home Loans Servicing, LP (**BANA**), by and through its attorneys  
of record, the law firms of GERRARD COX LARSEN and AKERMAN LLP, and Plaintiff SFR

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1 INVESTMENTS POOL 1, LLC (SFR), by and through its attorneys of record, the law firm of KIM  
2 GILBERT EBRON file this stipulation to extend time to respond to SFR's Motion For  
3 Reconsideration by seven (7) days. This is BANA's first request for an extension of time to respond  
4 to SFR's Motion For Reconsideration of Order.

5  
6 1. WHEREAS, on October 3, 2019, Defendant BANA filed a Motion to Dismiss  
7 [ECF No. 9] against Plaintiff SFR, arguing that SFR's quiet title claims were barred by a five-year  
8 statute of limitations.

9 2. WHEREAS, on October 2, 2019, SFR filed a Motion for Summary Judgment [ECF  
10 No. 13] against BANA.

11 3. WHEREAS, on November 14, 2019, BANA filed an Opposition to SFR's Motion for  
12 Summary Judgment and Countermotion for Summary Judgment [ECF No. 17] ("BANA's MSJ")  
13 against Plaintiff SFR.

14 4. WHEREAS, on June 11, 2020, this Court entered an Order [ECF No. 36] granting  
15 BANA's MSJ finding that SFR's claims were barred by a five-year statute of limitation.

16 5. WHEREAS, on July 3, 2020, Plaintiff SFR filed its Motion for Reconsideration of  
17 Order [ECF No. 38] based on the new authority from the Nevada Supreme Court in *Berberich v.*  
18 *Bank of Am., N.A.*, 136 Nev. Adv. Op. 10, 460 P.3d 440, 443 (2020).

19 6. The parties believe good cause exists for this request. BANA's counsel have been  
20 either (i) presently on vacation with family and is out of state or (ii) became unexpectedly ill,  
21 preventing BANA from completing the response in time under Local Rule 7-2(b). A brief one-week  
22 extension will permit counsel to adequately prepare a response. Accordingly, the parties stipulate to  
23 extend time for BANA to file its Response to SFR's Motion for Reconsideration up to and including  
24 **July 24, 2020.**

25  
26 ///  
27  
28

7. This Stipulation is made in good faith and not for purpose of delay.

DATED this 16<sup>th</sup> day of July, 2020.

DATED this 16<sup>th</sup> day of July, 2020.

**GERRARD COX LARSEN**

**AKERMAN LLP**

/s/ Douglas D. Gerrard, Esq.

/s/ Rex D. Garner, Esq.

Douglas D. Gerrard, Esq.

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Nevada Bar No. 11918

Nevada Bar No. 9401

2450 St. Rose Parkway, Suite 200

1635 Village Center Circle, Suite 200

Henderson, NV 89074

Las Vegas, Nevada 89134

*Attorneys for Defendant Bank of America, N.A.*

*Attorneys for Defendant Bank of America, N.A.*

DATED this 16<sup>th</sup> day of July, 2020.

**KIM GILBERT EBRON**

/s/ Diana S. Ebron, Esq.

Diana S. Ebron, Esq.

Nevada Bar No. 10580

Jacqueline A. Gilbert, Esq.

Nevada Bar No. 10593

Karen L. Hanks, Esq.

Nevada Bar No. 9578

7625 Dean Martin Drive, Suite 110

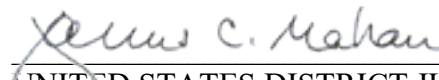
Las Vegas, Nevada 89139

*Attorneys for Plaintiff SFR Investments Pool 1, LLC*

**ORDER**

**IT IS HEREBY ORDERED** that the above Stipulation to Continue Response Deadline to SFR's Motion for Reconsideration of Order (ECF No. 38) until **July 24, 2020** is **GRANTED**.

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: July 27, 2020

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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of GERRARD COX LARSEN, and that on the 17<sup>th</sup> day of July, 2020 and pursuant to Fed. R. Civ. P. 5, I e-served a true and correct copy of the **STIPULATION AND ORDER TO CONTINUE RESPONSE DEADLINE TO SFR'S MOTION FOR RECONSIDERATION** via the Federal Courts CM/ECF Filing System, and served the following parties addressed as follows:

Diana S. Ebron, Esq.  
Jacqueline A. Gilbert, Esq.  
Karen Hanks, Esq.  
KIM GILBERT EBRON  
7625 Dean Martin Drive, Suite 110  
Las Vegas, NV 89139  
[diana@kgelegal.com](mailto:diana@kgelegal.com)  
[jackie@kgelegal.com](mailto:jackie@kgelegal.com)  
[karen@kgelegal.com](mailto:karen@kgelegal.com)  
*Attorneys for Plaintiff*  
*SFR Investments Pool 1, LLC*

Natalie L. Winslow, Esq.  
Rex D. Garner, Esq.  
AKERMAN, LLP  
Email: [natalie.winslow@akerman.com](mailto:natalie.winslow@akerman.com)  
Email: [rex.garner@akerman.com](mailto:rex.garner@akerman.com)  
*Attorneys for Defendant*  
*Bank of America, N.A.*

/s/ Esther K. Medellin  
Esther K. Medellin, An Employee  
Of GERRARD COX LARSEN